

Jonathan Brookins
1905 East Marks, Apt. A
Orlando, FL 32803

RECEIVED

OCT 15 2010

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

AT 8:30 _____ M
WILLIAM T. WALSH, CLERK

BELLATOR SPORT WORLDWIDE, LLC.,

Civil Action No. 2:10-04091 (DMC)(JAD)

Plaintiff,

v.

ZUFFA, LLC, d/b/a ULTIMATE FIGHTING
CHAMPIONSHIP, JONATHAN BROOKINS,
MICKEY DUBBERLY, JOHN DOES 1-5,

Defendants,
_____ /

GENERAL DENIAL

1. I generally deny all claims being made against me.

AFFIRMATIVE DEFENSES

2. Plaintiff's counts are all barred due to Plaintiff's release of myself, Jonathan Brookins from the contract I was purportedly under ("Exhibit A") of Plaintiff's complaint. Plaintiffs verbally released myself, Jonathan Brookins, from any and all contractual obligations provide pursuant to said contract.
3. Plaintiff's counts are all barred due to Plaintiff's waiver of myself, Jonathan Brookins from the contract I was purportedly under ("Exhibit A") of Plaintiff's complaint. Plaintiffs waived the exclusivity provision of said contract by allowing myself to partake in other events. Plaintiff knew of the events and chose to waive the exclusivity provision.
4. Plaintiff's counts are all barred due to lack of consideration from the contract I, Jonathan Brookins, was purportedly under. Plaintiff failed to provide the necessary number of fights pursuant to the terms of said contract.
5. Plaintiff's counts are all barred by the doctrine of equitable estoppels. Plaintiffs did not act in good faith by failing to provide any fights or offering any fights pursuant to the terms of the contract "Exhibit A".

Defendant Jonathan Brookins reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure and any other defenses, at law or in equity, that may be available now or may become available in the future based on discovery or any other factual investigation in this case.


Jonathan Brookins

CERTIFICATE OF FILING

I HEREBY CERTIFY that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Jonathan Brookins

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WILLIAM T. WALSH, CLERK

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